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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

JUL 26 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Truth-in-Billing

And

Billing Format

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CC Docket No. 98-170

COMMENTS OF OMNIPOINT COMMUNICATIONS, INC.

Omnipoint Communications, Inc. ("Omnipoint"), through its attorneys, submits these comments in response to the Commission's First Report and Order and Further Notice of Proposed Rulemaking ("First Report and Order") to determine whether and to what extent the FCC's proposed truth-in-billing requirements should apply to wireless carriers.¹ In its comments filed in response to the original notice of proposed rulemaking in this proceeding², Omnipoint supported the Commission's goal of promoting truth-in-billing by requiring telephone bills to be clearly organized with full and non-misleading descriptions of all charges, but urged the Commission to recognize the significant differences between wireline and wireless telephone service and the impact of those differences on the need for regulation. The Commission did, in fact, recognize those differences and, pending further comment, preliminarily applied only two fundamental truth-in-billing concepts to wireless carriers: (1) that the name of the service provider associated with each charge be clearly identified on the bill, and (2) that each bill should prominently display a telephone number that customers may call free-of-charge in order

¹ First Report and Order and Further Notice of Proposed Rulemaking, CC Dkt. 98-170 (released May 11, 1999).

² Truth-in-Billing and Billing Format, 63 Fed. Reg. 55077 (Oct. 14, 1998).

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to inquire or dispute any charge contained on the bill.³ Omnipoint applauds the Commission's foresight in this regard and urges it to refrain from applying the remaining truth-in-billing regulations to CMRS carriers. As set forth in more detail below, the highly competitive nature of the wireless telephone business will ensure that customers are treated fairly, not only in connection with the bills they receive, but also the service offerings available to them.

Omnipoint and its affiliates operate several broadband PCS systems in and around New York, Philadelphia, Detroit, Indianapolis, Boston, and Miami. As a competitive wireless entrant, Omnipoint is committed to offering a comprehensive range of wireless services in response to customer demand, including digital voice CMRS service; enhanced and information services; domestic and international roaming; wireless international calling; and pre-paid calling service options. Because of the competitive nature of CMRS, Omnipoint must offer in each of its markets a wide range of services at competitive prices and must employ comprehensible, customer-friendly billing techniques in order to attract and retain customers.

When the FCC established its truth-in-billing rules in May, 1999, its stated purpose was to "reduce slamming and other telecommunications fraud," "aid customers in understanding their telecommunications bills," and "provide them with the tools they need to make informed choices...for telecommunications service."⁴ Section 64.2000(a) specifically exempts CMRS providers from all but the requirements that the name of the service provider for each charge be identified on the bill and the inclusion of a toll-free telephone number on the invoice for billing

³ First Report and Order, ¶ 17.

⁴ 47 C.F.R. § 64.2000(a).

inquiries.⁵ It has now asked whether there is reason to apply the remainder of Section 64.2001 to CMRS.

In its First Report and Order, the Commission states that "absent evidence that there is a problem with wireless bills, it might not be necessary to apply the remaining rules in the CMRS context"⁶ and, therefore, that forbearance may be appropriate. It likewise suggests that, as a practical matter, the concerns that arise in the wireline context may simply not be applicable in the CMRS context. The short answer is that, just as it found in its First Report and Order, there is no reason for the Commission to apply the remainder of Section 64.2001 to CMRS providers because (1) there is no evidence of a problem to be rectified and (2) the rules to be applied are irrelevant in the CMRS context.

A. Is there a billing problem in the CMRS industry? The Commission is quite right to note, as it did in the First Report and Order that "the record does not...reflect the same high volume of customer complaints in the CMRS context, nor does the record indicate that CMRS billing practices fail to provide consumers with the clear and non-misleading information they need to make informed choices."⁷ Part of the reason for the high level of satisfaction in the CMRS market is a reflection of the level of competition in the industry, which differs significantly from the level of competition in the wireline industry. Although a fairly large number of companies have received authority to operate as competitive local exchange carriers, very few of those entities are actually operating and the inroads they have made into the

⁵ CMRS providers will be required to follow the standard descriptions for line item charges that result from federal regulatory action, when adopted. First Report and Order, ¶ 18.

⁶ First Report and Order, ¶ 16.

⁷ First Report and Order, ¶ 16.

incumbent local exchange carriers' dominance of the market has not yet been significant. Thus, as a practical matter, there is, as yet, no strong competition in the local exchange marketplace.

In the CMRS marketplace, on the other hand, there is an abundance of competitive alternatives. The Commission has licensed two cellular operators, up to six broadband PCS operators, and an ESMR provider per market to ensure competition. In its Fourth Report on Competitive Market Conditions With Respect to Commercial Mobile Services, released June 24, 1999 (FCC 99-136) (the "Fourth Report"), in addition to growth in other aspects of the mobile telephone industry, the Commission acknowledges that "broadband PCS...[has] continued to aggressively deploy their networks" which has resulted "in improved coverage and increased competition...."⁸ The Commission goes on to note that

the past year has been one of strong growth for broadband PCS operators....
A dozen new operators have launched systems,... and a number of smaller carriers.
During 1998, operators for whom there is publicly available information increased their
subscribership by 255 percent to over six million.

* * *

To date, broadband PCS service has been launched in at least some portion of 320 BTAs containing nearly 229 million POPs. While 46 percent of these 320 BTAs have only one broadband PCS operator, 111 BTAs have two PCS operators, 54 BTAs have three operators, and eight BTAs now have four operators. These 173 BTAs include 75 percent of the nation's POPs.⁹

CMRS providers thus operate in an environment such that they must not only offer competitive products at competitive prices, they must also offer competitive customer service, and this includes billing. Customers in the CMRS market are too savvy and have too many alternative service providers to tolerate underhanded treatment in any of these areas and will change carriers if they believe they could receive better service elsewhere. CMRS providers

⁸ Fourth Report at 4.

⁹ Fourth Report at 31. Of course, all of these BTAs also have two cellular operators and an ESMR provider.

know that confusing, deceptive or misleading bills will lose a company customers as quickly as an inferior product or high rates. The knowledge that you are not a near-monopoly provider and that consumers are not reluctant to shop around is incentive enough for providers to create clear, organized bills. Since it appears that the billing problems so prevalent in the wireline industry are not present in the CMRS industry, surely there is no reason to legislate a solution where there is no problem.

Absent the prevalence of confusing, misleading and deceptive billing practices present in the wireline industry, it seems appropriate for the Commission to forbear from imposing additional regulation on CMRS providers. Quite simply, forbearance is appropriate because there is no evidence that enactment or enforcement of regulation is necessary either (1) to ensure that the charges, practices, classifications, or regulations by, for, or in connection with CMRS carriers are just and reasonable and are not unjustly or unreasonably discriminatory or (2) for the protection of consumers. 47 U.S.C. § 160. To the contrary, forbearance from unnecessary regulation is certainly consistent with the public interest and promotes competition. Even the Office of Management and Budget "recommend[ed] that [the FCC] not impose undue burdens on wireless providers."¹⁰ Forbearing from applying the remainder of its billing guidelines is surely warranted in the absence of evidence of abuse.

B. Do the rules make sense in the CMRS Context? The Commission should refrain from applying the remainder of its billing requirements on CMRS providers, because they simply do not apply in the CMRS context. For instance, CMRS carriers do not bill for third parties, so cramming is not an issue, as it is in the wireline industry. Likewise, CMRS carriers are not

¹⁰ First Report and Order, ¶ 76.

required to provide equal access to long distance carriers, so there is no need to indicate to a customer that there is a new long distance service provider, as there is in the wireline industry. In addition, there is no reason for a CMRS provider to identify those charges on its customer invoice that must be paid in order to avoid termination of basic local wireline service, because failure to pay a CMRS bill would have no effect whatsoever on the customer's wireline service. Again, the criteria for forbearance by the Commission are met because there is no public benefit to be gained from applying irrelevant regulation.

The Commission's rules are, understandably, modeled on landline service, but do not fit current CMRS offerings. The highly competitive nature of the CMRS market dictates that some of the truth-in-billing guidelines developed by the FCC, while applicable and appropriate in the context of wireline service, are neither in the context of wireless service. To its credit, the Commission already recognized that Section 64.2001 is not valid to all telecommunications providers. It likewise properly delineated those provisions that are relevant in the CMRS context and will enforce them.

Requiring CMRS providers to comply with the remaining truth-in-billing rules would simply impose unnecessary billing obligations. For example, one popular wireless service option offered by Omnipoint is prepaid service (called "No-Fee Prepay (sm)"), and customers choosing this service do not receive monthly bills or statements. Customers deposit money into an account and, as wireless services are used, the costs of such services are deducted from the balance of the account. This service is similar to a prepaid calling card, which includes a certain amount of usage for which the purchaser never receives a bill. Customers need not have a positive credit history in order to take advantage of prepaid wireless service. Thus, wireless prepaid services support the universality of access to the Public Switched Telephone Network,

because traditional carriers with policies concerning customer credit histories often inhibit low-income and credit-challenged consumers from establishing telephone service of any kind.

Additionally, the prepaid option allows for easier consumer budgeting of expenses incurred for telephone service. In lieu of monthly bills or statements, Omnipoint's No-Fee Prepay subscribers can easily obtain information on the amount of usage remaining in their account in two ways: (1) calling Omnipoint's toll-free automated balance information number, where the customer receives an update on his or her current account balance, as well as the expiration date of the minutes remaining in the customer's account, and (2) automatically receiving a reminder message prior to completing a call when the customer's account balance falls below 30 minutes of usage remaining or seven days before account expiration. The reminder message notifies customers of the expiration date and the number of minutes left in the customer's account. In addition, Omnipoint's prepaid subscribers are provided with a detailed service brochure when they sign up for service, which provides the above-described information in a clear, understandable manner.¹¹

Omnipoint believes these services are critically important to low-income and credit-challenged subscribers. By substituting the toll-free account update number and the automatic reminder messages for monthly invoices, Omnipoint meets customer expectations because each prepaid customer can easily ascertain his or her account balance, along with the expiration date of the minutes remaining in the account, and ensures, in compliance with the Commission's truth-in-billing principles, that customers receive clear and truthful information as to their accounts. Further, the avoidance of billing costs is one way that wireless carriers like Omnipoint

¹¹ See Exhibit 1.

can afford to continue to offer a relatively inexpensive prepaid service option. If CMRS carriers are forced to provide prepaid service customers with written telephone bills, the flexibility and low-cost nature of this very desirable service is diminished.

For those Omnipoint customers who do not choose the prepaid option, every effort is made to ensure that customer invoices are clear and concise and provide the consumer with all information necessary to determine what he or she is being charged for. A sample of such an invoice is attached hereto¹² and we believe the Commission will agree that the likelihood of misunderstanding the bill or of Omnipoint "hiding" charges in the bill is remote. However, in the event a customer has any questions, the name of the service provider and the toll-free number of a customer service representative are clearly identified. In fact, where applicable, Omnipoint already complies with other provisions of the FCC's guidelines, such as highlighting service changes since the previous month, where those guidelines make sense and are relevant to the type of service offered. It is, and always has been, Omnipoint's intention to provide accurate billing descriptions that are consistent with the realities of its CMRS offerings and customer expectations.

Omnipoint fully supports the FCC's efforts to bring clarity to the invoices of telephone customers and believes the Commission has walked the appropriate line in distinguishing between regulation that is necessary and appropriate for the wireline telephone industry and that which is necessary and appropriate for the CMRS industry. The Commission is to be commended for recognizing that CMRS carriers should not be forced to conform billing practices to a model and rules appropriate for traditional landline carriers and that "one size fits

¹² See Exhibit 2.

all" regulation is neither appropriate nor necessary. The requirements the FCC chose to impose on CMRS operators in the First Report and Order adequately protect the CMRS consumer while preserving flexibility in operations and refraining from over-regulating CMRS service providers. Unless and until there is evidence of abuse on the part of the CMRS industry that needs correction, Omnipoint believes that the Commission should forbear from applying any additional truth-in-billing guidelines beyond those currently set forth as specifically applicable to CMRS providers.

Respectfully submitted,

OMNIPOINT COMMUNICATIONS, INC.

By: 

Mark J. Tauber
Piper & Marbury L.L.P.
1200 19th Street, N.W.
Washington, D.C. 20036
(202) 861-3900

Its Attorneys

Date: July 26, 1999



For Billing Inquiries
Call 1-888-OMNI-611

Account Name

Account Number

Invoice Date

Jun 12, 1998

For Customer Use:

Amount Paid _____

Date Paid _____

Check # _____

Previous Balance	Payments Received	Adjustments	Balance Forward	Late Payment Charges	Current Charges	Amount Due
36.68	36.86cr	.00	.18cr	.00	34.88	34.70

SUMMARY OF ACCOUNT ACTIVITY

Previous Balance	Amount	Total
Payments thru 06/10/98 Thank You	36.68	
Adjustments	36.86cr	
Balance Forward	.00	.18cr
Current Monthly Charges		
VOICE SERVICE	29.18	
PAGING AND SHORT E-MAIL	.00	
Taxes	5.70	
Total Current Charges		34.88
TOTAL BALANCE DUE by Jun 27, 1998		34.70

SPECIAL MESSAGES

Now Omnipoint has expanded coverage to include many beaches. You can use your phone in Omnipoint service areas such as: New England's Cape Cod, Martha's Vineyard, Nantucket, Block Island; NJ beaches from Sandy Hook to Cape May; Delaware's Rehoboth Beach area, and many NY and Long Island beaches. For more detailed information, please see your regional coverage area map or visit our website at <http://www.omnipoint.com>

Please detach and return this portion with your payment.

Account Name

Account Number

Invoice Date

Jun 12, 1998



CUSTOMER CARE
PO BOX 21990
LEHIGH VALLEY PA 18002-1990

Total Amount Due By	Total Amount Due	Amount Paid
06/27/98	34.70	

AB 01 015567 11545 B 114 A

Please make checks payable to:
Omnipoint Communications Services



IMPORTANT INFORMATION
Check here if change of address is required.
See reverse for Change of Address form.

OMNIPOINT COMMUNICATIONS, INC.
GENERAL POST OFFICE
PO BOX 29786
NEW YORK NY 10087-9786



084000010000100001230799804230000034706

An Explanation of Your Bill

OMNIPONT Account Name: XYZ Company Account Number: 0010001000 Invoice Date: Mar 31, 1994

For Billing Inquiries Call 1-888-OMNI-6111 For Customer Use (Amount, Rate, Date, Plan, Check #)

Previous Balance	Payments Received	Adjustments	Balance Forward	Late Payment Charges	Current Charges	Amount Due
3834.17	3834.17cr	5.45cr	5.45cr	0.00	3035.00	3035.55

SUMMARY OF ACCOUNT ACTIVITY

	Amount	Total
Previous Balance	3834.17	
Payments	3834.17cr	
Adjustments	5.45cr	
Balance Forward		6.45cr
Late Payment Charges		.00
Current Monthly Charges		
Voice Service	288.32	
Paging and Short E-Mail Service	20.16	
Equipment	2836.00	
Volume Usage Discount	50.00cr	
Other Charges and Credits	124.95cr	
Taxes	65.47	
Total Current Charges		3035.00

SPECIAL MESSAGES

Please detach this portion and return with your payment

OMNIPONT PO Box 219K Lehigh Valley PA 18001-199K

Total Amount Due \$ 3035.55

06/15/94

XYZ Company ATTN:Accounts Payable 1742 Street Name Los Angeles, CA 90057

OmniPoint Communications, Inc. General Post Office PO Box 29786 New York, NY 10087-9786

02000244000069072466329910820009785006

Sample Account Summary and Remittance Page

Account Summary Explanation

1. Toll Free Customer Care number.
2. Account charge/credit activity prior to this month's billing period.
3. Summary of current month's activity including service, equipment, other charges, credits and taxes.
4. The total amount of charges due this billing period.
5. Special Messages includes up-to-date information regarding your billing or Omnipoint services.
6. The total amount due on the account.

Call this number if you have questions about your bill

Enter payment information here and keep this section of the bill for your records

Detach the remittance section from your bill, and mail it along with your payment in the enclosed envelope

Descriptions of call characteristics further define call detail

OMNIPONT Account Name: XYZ Company Account Number: 0010001000 Invoice Date: Mar 31, 1994

For Billing Inquiries Call 1-888-OMNI-6111

Voice/Service Detail (407-555-0002)

Monthly Plan Charges	Rate	Amount	Total
03/01/94-03/31/94 Basic Plan 1 Unit	45.00	45.00	
Total Plan Charges			45.00
Monthly Feature Charges			
03/01/94-03/31/94 Call Accountant 1 Unit	4.95	4.95	
03/01/94-03/31/94 Call Waiting 1 Unit	3.00	3.00	
Total Feature Charges			7.95
Other Charges and Credits			
03/01/94 Activation Charge 1 Unit	38.50	38.50	
03/01/94 Promotional Airtime		25.00cr	
Total Other Charges and Credits			13.50
Usage Charges			
02/01/94 Basic Plan Peak 97 Mins	30	29.10	
Off-Peak 15 Mins	20	3.20	
Total Usage Charges			32.30
Roaming Usage Charges			
Airtime 1 Mins		.50	
Long Distance 1 Calls		.21	
Taxes		.08	
Total Roaming Usage Charges			.79
Total Voice/Service Charges			\$9.54

Detail of Usage Charges (407-555-0002)

Line	Date	Time	Call From	Call To	No Called	Call Type	Rate Per	Min	Charge
1	02-01	07:40P	Batco New York	Los Angeles	CA 407-555-1111	SR		8	.81
2	02-02	08:13A	Batco New York	Batco Assistant	CA 407-555-0232	P		2	.30
3	02-03	08:15A	Batco New York	Peasabene	CA 407-555-1112	P		27	8.38
4	02-05	08:15A	Batco New York	Peasabene	CA 407-555-1118	S		1	.71
5	02-07	08:15P	Batco New York	Los Angeles	CA 407-555-1114	S		10	2.24

Call Type: CF=Call Forwarding CW=Call Waiting D=Data DO=Voice Mail Dial Out F=Fax
 Rate Per: FR=Free PF=Partial Free R=Roaming 3C=3 Way Conference
 Rate Per: O=Off Peak P=Peak M=Multiple Periods

Sample Call Summary and Detail Page

Call Detail Explanation

7. Total Monthly Plan charges for account.
8. Summary of Voice/Service charges for account.
9. Roaming summary including length of calls and charges.
10. Detail of usage charges showing: date, time, call from location, location called, number called, call type, rate period, length of call and charge.
11. Call type and rate period legend of explanation.

CHANGE OF ADDRESS FORM

EFFECTIVE DATE _____

Name/Company _____

Attention _____

Street Address _____ Suite/Apt. _____

City _____ State _____ Zip _____

Home Phone () _____ Daytime Phone () _____

Account Number _____ Mobile Number () _____



For Billing Inquiries
Call 1-888-OMNI-611

Account Name

Account Number

Invoice Date

Jun 12, 1998

Account Summary

Payments		Rate	Amount	Total
06/08/98	BILL PAYMENT		36.86cr	
Total Payments				36.86cr

Taxes		Amount	Total
FEDERAL TAX		.92	
NEW YORK STATE TAX		1.23	
ROCKLAND COUNTY TAX		1.00	
GROSS RECEIPTS TAX		1.53	
911 SURCHARGE		.70	
FEDERAL UNIVERSAL SERVICE FUND		.32	
Total Taxes			5.70

For Billing Inquiries
 Call 1-888-OMNI-611

Account Name

Account Number

Invoice Date

Jun 12, 1998

VOICE SERVICE DETAIL

				Rate	Amount	Total
Monthly Plan Charges						
06/08/98-07/07/98	OMNIPOINT INSIDER NEW YORK PACKAGE	1	Unit	9.99	9.99	
Total Plan Charges						9.99
Other Charges and Credits						
05/08/98-06/07/98	Dropped Call Credit	8	Calls		2.06cr	
Total Other Charges and Credits						2.06cr
Usage Charges						
05/08/98-06/07/98	OMNIPOINT INSIDER NEW YOR	22	Mins	.35	7.70	
	Off Peak Local	2	Mins	Free	0.00	
		16	Mins	.23	3.68	
	Mobile Term.	16	Mins	Free	0.00	
		38	Mins	.23	8.74	
	Weekend	12	Mins	Free	0.00	
		5	Mins	.23	1.15	
Total Usage Charges						21.27
TOTAL VOICE SERVICE CHARGES						29.18

Detail of Usage Charges

Line	Date	Time	Call From	Call To	No Called	Call Type	Rate Prd	Min	Charges
1	5-08	9:46P	METRO NY				0	1	FREE
2	5-08	11:05P	METRO NY				0	1	FREE
3	5-08	11:07P					T	2	FREE
4	5-09	12:22A	METRO NY				T	3	FREE
5	5-09	9:45A	METRO NY				W	1	FREE
6	5-09	9:46A	METRO NY				W	1	FREE
7	5-09	1:35P	METRO NY				W	1	FREE
8	5-09	1:36P	METRO NY				W	1	FREE
9	5-09	1:55P	METRO NY				W	1	FREE
10	5-09	1:56P	METRO NY				W	1	FREE
11	5-09	2:07P	METRO NY				W	1	FREE
12	5-09	2:55P					T	2	FREE
13	5-09	2:58P	METRO NY				W	1	FREE
14	5-09	3:00P	METRO NY				W	1	FREE
15	5-09	4:25P	METRO NY				W	1	FREE
16	5-09	4:26P	METRO NY				W	1	FREE
17	5-09	4:52P	METRO NY				T	5	FREE
18	5-09	4:56P	METRO NY				T	1	FREE
19	5-09	9:58P	METRO NY				T	1	FREE
20	5-09	11:02P	METRO NY				T	1	FREE

Call Type: CF=Call Forwarding CW=Call Waiting D=Domestic DO=Voice Dial/Voice Mail Outdial
 F=Fax/Data I=International R=Roaming 3C=3 Way Conference
 TN=Telephone Notification
 Rate Prd: 0=Off Peak P=Peak T=Mobile Terminating M=Multiple Periods W=Weekend



For Billing Inquiries
 Call 1-888-OMNI-611

Account Name

Account Number

Invoice Date

Jun 12, 1998

Detail of Usage Charges

Line	Date	Time	Call From	Call To	No Called	Call Type	Rate Prd	Min	Charges
21	5-09	11:03P	METRO NY			T		1	FREE
22	5-10	12:21A	METRO NY			W		1	FREE
23	5-10	12:30A	METRO NY			W		1	0.23
24	5-10	12:32A	METRO NY			T		1	0.23
25	5-10	12:39A	METRO NY			W		1	0.23
26	5-10	12:47A	METRO NY			T		1	0.23
27	5-10	12:48A	METRO NY			T		1	0.23
28	5-10	1:07P	METRO NY			T		1	0.23
29	5-10	6:22P	METRO NY			T		1	0.23
30	5-10	6:24P	METRO NY			T		2	0.46
31	5-10	6:26P	METRO NY			T		3	0.69
32	5-10	8:30P	METRO NY			T		1	0.23
33	5-11	12:35A	METRO NY			T		1	0.23
34	5-11	1:38P	METRO NY			T		1	0.23
35	5-11	1:44P	METRO NY			T		1	0.23
36	5-11	1:45P	METRO NY			T		1	0.23
37	5-11	2:49P	METRO NY			P		1	0.35
38	5-12	10:52A	METRO NY			P		1	0.35
39	5-12	5:13P	METRO NY			P		4	1.40
40	5-14	6:24P	METRO NY			P		1	0.35
41	5-16	2:53P	METRO NY			W		1	0.23
42	5-19	6:18P	METRO NY			T		2	0.46
43	5-20	2:33A	METRO NY			T		1	0.23
44	5-20	3:49A	METRO NY			O		1	0.23
45	5-20	3:50A	METRO NY			O		1	0.23
46	5-20	3:50A	METRO NY			O		1	0.23
47	5-20	3:51A	METRO NY			O		1	0.23
48	5-20	3:52A	METRO NY			O		1	0.23
49	5-20	4:20P	METRO NY			T		2	0.46
50	5-20	4:22P	METRO NY			T		1	0.23
51	5-20	4:23P	METRO NY			T		3	0.69
52	5-20	5:07P	METRO NY			T		1	0.23
53	5-20	8:27P	METRO NY			T		1	0.23
54	5-21	1:19P	METRO NY			T		1	0.23
55	5-21	2:51P	METRO NY			P		7	2.45
56	5-21	4:11P	METRO NY			T		1	0.23
57	5-21	8:35P	METRO NY			T		1	0.23
58	5-21	9:27P	METRO NY			T		1	0.23
59	5-22	1:24P	METRO NY			P		2	0.70
60	5-26	1:55P	METRO NY			T		2	0.46
61	5-26	3:08P	METRO NY			P		1	0.35
62	5-26	5:11P	METRO NY			T		1	0.23
63	5-26	5:21P	METRO NY			P		1	0.35
64	5-26	5:32P	METRO NY			P		1	0.35
65	5-26	5:38P	METRO NY			P		1	0.35
66	5-26	10:10P	METRO NY			O		3	0.69
67	5-26	10:21P	METRO NY			O		1	0.23
68	5-26	10:25P	METRO NY			T		1	0.23
69	5-27	9:04P	METRO NY			O		4	0.92
70	5-27	9:07P	METRO NY			O		1	0.23
71	5-27	9:10P	METRO NY			T		2	0.46
72	5-27	9:58P	METRO NY			O		1	0.23
73	5-28	6:58P	METRO NY			P		2	0.70
74	6-05	10:25P				T		2	0.46
75	6-05	10:29P	METRO NY			O		1	0.23
76	6-06	12:11A	METRO NY			W		1	0.23
77	6-07	7:16P	METRO NY			W		1	0.23
Total Charges									111 21.27

Call Type: CF=Call Forwarding CW=Call Waiting D=Domestic DO=Voice Dial/Voice Mail Outdial
 F=Fax/Data I=International R=Roaming 3C=3 Way Conference
 TN=Telephone Notification
 Rate Prd: O=Off Peak P=Peak T=Mobile Terminating M=Multiple Periods W=Weekend

For Billing Inquiries
Call 1-888-OMNI-611

Account Name

Account Number

Invoice Date

Jun 12, 1998

PAGING AND SHORT E-MAIL ACCOUNT SUMMARY (ALL UNITS)

				Rate	Amount	Total
Monthly Feature Charges						
06/08/98-07/07/98	ON DEMAND SERVICES	1	Unit	.00	.00	
Total Feature Charges						.00
TOTAL PAGING AND SHORT E-MAIL CHARGES						.00

